

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010	)	WT Docket No. 96-86
	)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands	)	WT Docket No. 06-150
	)	
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules	)	WT Docket No. 06-169
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	

**COMMENTS OF MID-AMERICA REGIONAL COUNCIL**

The Mid-America Regional Council hereby submits these comments in response to the Commission's *Further Notice of Proposed Rulemaking* in the above-captioned proceedings.

The Mid-America Regional Council (MARC), on behalf of local governments in the Kansas City metropolitan area, wishes to comment on the above referenced Further Notice of Proposed Rulemaking regarding use of 700 MHz spectrum. Local governments in the bi-state Kansas City metropolitan area cooperate in the operation of a regional 9-1-1 system. The nine county region is also working toward investments to improve interoperability across communities, agencies and disciplines for both voice and mobile data communication. The metropolitan area is somewhat unique, with four counties on the Kansas side and five in Missouri, a mix of urban, suburban and rural areas spanning approximately 4,000 square miles.

One of our largest cities, Independence, MO, recently installed a 700 MHz communications system, and one of our largest counties, Johnson County, KS, is working with vendors to design a new 700 MHz system for their county and the 19 cities within their county. The city of Kansas City, MO is expected to release a Request for Proposals for a 700 MHz system later this year. To build on these local investments, local officials

from throughout the region are working together to design a regional voice and mobile data communications system to achieve true interoperability.

To accomplish this interoperability goal, the region and local communities must have the capability in the future to design a system that meets local and regional needs across the state line and diverse landscape, to make changes to the system as our communities' needs change and to ensure that the system may be efficiently and affordably maintained and used by large and small communities with varying fiscal capacities.

The Kansas City region wants the opportunity to license a local high-speed data network where we control coverage, capability and capacity. Our local communities working together want access to a nationwide network but want a local high speed data network in place in the near future, and are concerned about the timeframe of many years before a national system is in place. The Kansas City region needs a portion of the data spectrum to be under local or regional control, and we need flexibility to choose wideband or broadband systems.

**We urge the Federal Communications Commission to choose an option for meeting nationwide data system needs that permits locally-owned and locally or regionally controlled wideband data systems in the 700 MHz public safety spectrum.**

Sincerely,

A handwritten signature in black ink that reads "Marlene Nagel". The signature is written in a cursive, flowing style.

Marlene Nagel  
Director of Community Development

Date submitted: May 22, 2007